

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

PRECISION ASSOCIATES, INC.;
ANYTHING GOES LLC d/b/a MAIL
BOXES ETC., and JCK INDUSTRIES,
INC., on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

PANALPINA WORLD TRANSPORT
(HOLDING) LTD., *et al.*,

Defendants.

Case No.: 08-CV-00042 (BMC) (PK)

**DECLARATION OF
MICHAEL R. O'CONNOR RE VON
TERZIAN LETTER DATED
SEPTEMBER 23, 2022**

I, MICHAEL R. O'CONNOR, ESQ., hereby declare and state as follows:

1. I was a full-time employee at Epiq Class Actions & Claims Solutions, Inc. ("Epiq") from November 15, 2010 until July 13, 2022, most recently as a Vice President. I am a licensed attorney in Oregon and currently a Senior Vice President at Western Alliance Bank. Prior to joining Epiq in 2010, I was an owner at the Garvey Schubert Barer law firm (n/k/a "Foster Garvey") in Portland, Oregon, and was engaged in private practice for 13 years. I received my Juris Doctorate from the University of Oregon Law School in 1997 and my Bachelor of Arts degree from Yale University in 1994. I have first-hand knowledge of, and am competent to testify, regarding the matters stated herein.

2. This is the fourth declaration I have submitted in this case. I previously submitted:

- a. the January 28, 2019 Declaration of Michael R. O'Connor Esq. in which I described in detail Epiq's administration of claims made in this case;

- b. the July 14, 2021 Declaration of Michael R. O'Connor in Support of Plaintiffs' Motion for Second Distribution of Settlement Funds describing the outcome of the first distribution in the case and outlining the plan for a second distribution; and
- c. the July 13, 2022 Declaration of Michael R. O'Connor in Support of Plaintiffs' Motion for Distribution of Residual Settlement Funds describing the extraordinarily successful distribution of settlement monies in this matter.

These prior Declarations are incorporated herein by reference.

3. Epiq obtained a copy of the September 23, 2022 letter submitted to this Court by John von Terzian. The letter is on stationary for "Bremer Lloyd Organic" and lists a mailing address in California.

4. Since 2016, Epiq received five letters from Mr. von Terzian. The first was dated July 5, 2016 on stationary with a California address for "LeClaire, Inc." in which Mr. von Terzian requests an update on the status of a claim for what he describes as "our company." A true and accurate copy of that letter is attached as Exhibit 1.

5. Epiq responded to Mr. von Terzian's letter on July 15, 2016, letting him know that there was no record of a claim submitted for LeClaire, Inc. The letter also provides Mr. von Terzian a deadline of April 3, 2017 to submit a claim (which was the third claim-filing deadline in this administration). A true and accurate copy of that letter is attached as Exhibit 2.

6. Epiq next heard from Mr. von Terzian more than six year later, in a letter dated August 9, 2022. This second letter from Mr. von Terzian was on "Bremer Lloyd Organic" stationary. In the letter, Mr. von Terzian states "we have not received any Settlement or Distribution" and requests Epiq's "prompt attention and resolution of same." The letter included

a completed claim form that was addressed to “LeClaire, Inc.” but completed on behalf of “Bremer Lloyd Ltd.” A true and accurate copy of that letter and claim form are attached as Exhibit 3.

7. Epiq’s third and fourth letters from Mr. von Terzian are dated August 22, 2022. Both letters were on “Bremer Lloyd Organic” stationary. The text of the two letters is identical, but the attachments included with each are different and they came to Epiq in separate envelopes. One of the August 22, 2022 letters encloses: (a) a copy of Epiq’s July 15, 2016 letter (which confirms Mr. von Terzian’s receipt of that correspondence and the associated claim-filing deadline); (b) a copy of Mr. von Terzian’s August 9, 2022 letter to Epiq; and (c) a copy of the claim form Mr. von Terzian submitted with his August 9, 2022 letter. The second August 22, 2022 letter attaches a postcard notice sent to “LeClaire, Inc.” notifying the recipient that the second round claim filing deadline was March 31, 2016. True and accurate copies of these letters are attached as Exhibits 4 and 5.

8. On September 2, 2022, Epiq received its fifth letter from Mr. von Terzian. The letter was postmarked August 29, 2022 and is a copy of Mr. von Terzian’s July 5, 2016 letter (on “LeClaire, Inc.” stationary) with an added note near the top of the letter that reads “29.08.22 STILL NO SETTLEMENT ON THIS.” A true and accurate copy of this letter is attached as Exhibit 6.

9. On September 8, 2022, Epiq responded to Mr. von Terzian’s four August 2022 correspondence informing him that Epiq did not receive a timely claim related to his inquiries and that the case was now closed. A copy of this letter was included in Mr. von Terzian’s letter to this Court. For ease of reference, a true and accurate copy is also attached to this Declaration as Exhibit 7.

10. Epiq has no record of a claim being submitted by Mr. von Terzian or LeClaire, Inc. or Bremer Lloyd Organic or Bremer Lloyd Ltd. by the April 3, 2017 or any other deadline.

11. Epiq also has no record of any calls being made to its call center by Mr. von Terzian or emails being sent by him to Epiq's email inbox for the case. The toll-free telephone number, official administration website address and email address for the case are included on the notices received by Mr. von Terzian and referenced above. The toll-free number and administration website also appeared in Epiq's July 15, 2016 letter.

12. In preparation for this Declaration, Epiq analyzed the late claim form submitted by Mr. von Terzian in 2022. Had the claim been timely filed, it would have been approved for the minimum payout amount made to class members, which was \$100.

13. Epiq denied late claims in this matter—claims which were made years before the claim submitted on August 9, 2022 by Mr. von Terzian. Mr. von Terzian's claim was treated the same as other late claims received.

14. When searching the California Secretary of State's business search website, there are no records for LeClaire, Inc or Mr. von Terzian or Bremer Lloyd Organic or Bremer Lloyd Ltd.

15. Following this Court's August 3, 2022 Order, the remaining settlement funds were distributed, the qualified settlement fund was terminated and the bank account for the distributions in this matter was closed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 18th day of October in the District of Columbia.



Michael O'Connor

EXHIBIT

1

LECLAIRE, INC.

EXPORT – WHOLESALE

Postfach 3894 – Valley Village, California 91617

215-817-0654

LeClaireandBayot@gmail.com – BremerLloyd@gmail.com



5 July 2016

Freight Forwarders Claims Administration
P. O. Box 3747
Portland, OR 97208-3747

Ladies and Gentlemen,

Our company has received the attached notice and similar previous notices.

We have not received any other information regarding the status of this claim and the progress of this action.

As you have been previously informed, we have been customers of DHL as well as Hellmann and request that you please confirm to us that all of the documentation is correct and complete in order for us to be considered part of this Class and to receive the distribution as ordered by the Court.

Thank you in advance for your attention to the above.

Very truly yours,

John von Terzian

Enclosure

**FREIGHT FORWARDERS
CLAIMS ADMINISTRATOR
PO BOX 3747
PORTLAND, OR 97208-3747
U.S.A.**

Court-Ordered Legal Notice

**Third and Final Set of Settlements in
Freight Forwarding Litigation**

Settlements with DHL and Hellmann

**This notice is only a summary.
For detailed information:
Call U.S. & CANADA:
1-877-276-7340 (Toll-Free)**

**INTERNATIONAL:
1-503-520-4400 (Toll)**

Visit www.FreightForwardCase.com

PRESORTED
FIRST-CLASS MAIL
AUTO
U.S. POSTAGE
PAID
PORTLAND, OR
PERMIT NO. 2882



4855120515752

**LECLAIRE INC
PO BOX 3894
VALLEY VLG, CA 91617-3894**

213
87140



**If You Purchased Freight Forwarding Services Providing Domestic and International Shipping,
You Could Get Benefits from a \$53.55 Million Settlement**

If you or your company used the services of certain freight forwarders, you may be entitled to a potentially significant cash payment from class action Settlements. Settlements have now been reached with the final two Defendants. Settlements were previously reached with 29 Defendants.

The Settlements involve a lawsuit claiming that certain freight forwarding companies secretly agreed to prices for their freight forwarding services worldwide, including on routes in the U.S. and between the U.S. and China, Hong Kong, Japan, Taiwan, India, Germany, the U.K. and other parts of Europe. The Settling Defendants deny that they did anything wrong.

Freight Forwarders provide transportation, or logistics services for shipments relating to the organization or transportation of items via air and ocean, which may include ancillary rail and truck services, both nationally and internationally, as well as related activities such as customs clearance, warehousing, and ground services.

Who is Included

You may be included in one or more of the Settlements (as a Class Member) if you: (1) Directly purchased Freight Forwarding Services; (2) from any of the Defendants, their subsidiaries, or affiliates; (3) from January 1, 2001 through January 4, 2011; (4) in the U.S., or outside the U.S. for shipments within, to, or from the U.S.

What Do the Settlements Provide?

DHL and Hellmann will establish a \$53,550,000

Settlement Fund. The amount of your benefits will be determined by the Plan of Allocation, which is posted on www.FreightForwardCase.com.

How to Get Benefits?

You need to submit a Claim Form, online or by mail, by April 3, 2017 to get a payment from the Settlements. You can obtain a Claim Form by calling one of the numbers on the front of the postcard or visiting the website. **If you already submitted a Claim Form for the first or second round of Settlements, you do not need to file a new claim.** You will automatically be paid from this third round of Settlements.

Your Other Rights

Even if you do nothing you will be bound by the Court's decisions. If you want to keep your right to sue DHL or Hellmann yourself, you must exclude yourself by September 20, 2016 from that Settlement. If you stay in a particular Settlement, you may object to it by September 20, 2016.

The Court has appointed lawyers to represent you at no charge to you. You may hire your own lawyer at your own cost. The Court will hold a hearing on November 4, 2016 to consider whether to approve: (1) the Settlements, (2) a request for attorneys' fees up to 33% of the Settlement Fund, plus interest, and reimbursement for litigation expenses; and (3) a request for Class Representative service awards of no more than \$75,000 each. You or your own lawyer may appear and speak at the hearing.

P3442 v.02 06.07.2016

LECLAIRE, INC.
POSTFACH 3894
VALLEY VILLAGE, CA 91617



FREIGHT FORWARDERS CLAIMS ADMINISTRATION
P. O. Box 3747
PORTLAND, OR 97208-3747

97208-374747



EXHIBIT

2

Freight Forwarders Settlement

c/o Freight Forwarders Claims Administrator
PO Box 3747
Portland, Oregon 97208-3747



4855122054817

LECLAIRE INC
PO BOX 3894
VALLEY VLG, CA 91617-3894

July 15, 2016

Tracking No. 1704287

Dear John von Terzian,

Thank you for your recent correspondence.

To determine if you qualify for Settlement benefits, you may fill out and complete the Claim Form and mail it to the Claims Administrator. We can confirm that we have not received a claim form from you.

If you did not file a claim postmarked by the August 24, 2015 First Round Settlement deadline, or by the March 31, 2016 Second Round Settlement deadline, you may still file a claim for the Third Round Settlements.

Each qualifying claim will be paid a pro rata share from the settlement pots for which it qualifies. For example, a qualifying Second Round Settlement claim will be paid a pro rata share of the Second Round Settlements and Third Round Settlements only.

The claims filing deadline for the Third Round Settlement is April 3, 2017. If you have not filed a claim as part of the First or Second Round Settlements, you must file your Third Round claim online or by mail, postmarked by the April 3, 2017 deadline.

Claims may be submitted online at www.FreightForwardCase.com. If you submit a Claim Form, you will receive future notifications containing additional important information, including with respect to any future Settlements. You may also download and mail your completed form to:

Freight Forwarders Claims Administrator
P.O. Box 3747
Portland, OR 97208-3747

If you should have any further questions please don't hesitate to visit the website www.FreightForwardCase.com or call us: US/Canada: 877-276-7340 / International: 1-503-520-4400.

Sincerely,

Freight Forwarders Claims Administrator

EXHIBIT

3

BREMER LLOYD ORGANIC

EXPORT – WHOLESALE FOR LECLAIRE & BAYOT PRODUCTS

Postfach 3894, Valley Village, California 91617 – 1-215-817-0654

LeClaireandBayot@gmail.com - BremerLloyd@gmail.com



9 August 2022

Freight Forwarders Settlement
c/o Freight Forwarders Claims Administrator
P. O. Box 3747
Portland, Oregon 97205-3747, USA

Ladies and Gentlemen,

To date, we have not received any Settlement or Distribution on the above matter.

We request your prompt attention and resolution of same.

Very truly yours,

John von Terzian
President

Enclosures

FREIGHT FORWARDERS SETTLEMENT
C/O FREIGHT FORWARDERS CLAIMS ADMINISTRATOR
PO BOX 3747
PORTLAND, OR 97208-3747
U.S.A



485527298122

00000372277 00000000 002 007 28592 11 11 00
LECLAIRE INC
PO BOX 3894
VALLEY VLG, CA 91617-3894

CLAIM FORM

GENERAL INSTRUCTIONS

This Claim Form relates to *Precision Associates, Inc., et al. v. Panalpina World Transport (Holding) LTD. et al.*, 08 Civ. 0042 (JG) (VVP) in the United States District Court for the Eastern District of New York.

To be eligible to share in the Settlement Fund for the Settlement Class in the above-named class action, you must have: (1) directly purchased Freight Forwarding Services; (2) from any of the Settling or Non-Settling Defendants, their subsidiaries, or affiliates; (3) from January 1, 2001 through January 4, 2011; (4) in the U.S., or outside the U.S. for shipments within, to, or from the U.S.

"Freight Forwarding Services" means freight forwarding, transportation, or logistics services for shipments, including services relating to the organization or transportation of items via air and ocean, which may include ancillary rail and truck services, both nationally and internationally, as well as related activities such as customs clearance, warehousing, and ground services.

If you fit this description you are a member of the Settlement Class and are entitled to submit a claim to share in the Settlement Fund. Excluded from the Settlement Class are all Defendants, their subsidiaries and affiliates, and their co-conspirators. Also excluded from the Settlement Class are all governmental entities.

Settlement Class Members who seek payment from the Settlement Fund must complete and return this Claim Form. If you already submitted a Claim Form for the first round of Settlements, you do not need to file a new claim. You will automatically be paid from this second round of Settlements. Completed Claim Forms must be mailed to the Freight Forwarders Claims Administrator ("Claims Administrator") at the above address or can be submitted via the Settlement website, www.FreightForwardCase.com. **Claim Forms must be POSTMARKED OR SUBMITTED ONLINE NO LATER THAN MARCH 31, 2016.** You should save all relevant documents supporting your claim as you may be required to provide them later.

All inquiries regarding your claim should be made (1) in writing to the Claims Administrator at the address above, (2) by visiting the settlement website, www.FreightForwardCase.com, (3) via e-mail at questions@FreightForwardCase.com, or (4) by calling the information helpline: U.S. & Canada (Toll-Free) 1-877-276-7340; International (Toll) (503) 520-4400.

Before you complete and submit this Claim Form by mail or online, you should read and be familiar with the Notice of Proposed Class Action Settlement ("the Notice") available at www.FreightForwardCase.com. Defined terms (with initial capitals) used in these General Instructions have the same meaning as set forth in the Notice. By submitting this

**QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com**

485527298122

SECTION B – SCHEDULE OF QUALIFYING PURCHASES OR SHIPMENTS

Please provide a summary of all Freight Forwarding Shipping Services that you have purchased from any of the below listed defendants or their subsidiaries or affiliates: (1) for shipments within, to, or from the United States or (2) in the United States for shipments anywhere in the world, during the period from January 1, 2001 to January 4, 2011. Please type or print neatly all information and check all that apply. If you need additional space, please continue on additional pages, make a note of the same on this Claim Form, and submit your additional pages with this Claim Form. Round the total purchase amount to the nearest dollar or whole unit of the currency for which you are claiming. Please indicate the currency you are using (Example: USD, EUR, CAD, JPY, CNY). Please also specify the date(s) of your purchase(s) and the origin(s) and destination(s) of your shipment(s).

Freight Forwarder (Indicate All That Apply)	Total Purchase Amount January 1, 2001 through January 4, 2011 (All Freight Charges And Surcharges, Excluding Taxes On Those Charges)			Shipping Routes	
	CURRENCY	AMOUNT	DATE(S) (MMDDYY)	ORIGIN(S)	DESTINATION(S)
ABX or SAIMA					
BAX Global					
Dachser					
DFDS or DSV					
DHL, Danzas (dba, DHL Global Forwarding), or Deutsche Post					
DHL Japan, DHL Global Forwarding Japan K.K., Danzas Maruzen, Airborne Express, or Air Express International					
EGL or Eagle					
Excel					
Expeditors					
Geodis or Geodis Wilson					
Geo-Logistics or Agility					

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com

**QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com**

485527298122

CURRENCY	AMOUNT	DATE(S) (MMDDYY)	ORIGIN(S)	DESTINATION(S)
United Aircargo Consolidators				
UTI Worldwide				
Varitac				
Yamato				
Yusen Air & Sea				

1. Please state the sum total of freight forwarding shipments that you made with all Defendants or affiliates of the Defendants for each of the following:

a. For air shipments from Japan into the United States:

Total number of shipments between September 1, 2002 and November 30, 2007

Total number of shipments between December 1, 2007 and January 4, 2011

b. For air shipments from anywhere in the world (except Japan) to the United States:

Total number of shipments from January 1, 2003 to November 30, 2007

Total number of shipments from December 1, 2007 to January 4, 2011

c. For ocean shipments from anywhere in the world to the United States:

Total number of shipments between September 1, 2002 and November 30, 2007

Total number of shipments between December 1, 2007 and January 4, 2011

2. Please state the sum total poundage of freight forwarding shipments that you made with all Defendants or affiliates of the Defendants for each of the following:

a. For air shipments from anywhere in the world into the United States:

Total pounds of shipments between October 1, 2001 and November 30, 2007

Total pounds of shipments between December 1, 2007 and January 4, 2011

b. For air shipments from Japan to the United States, or for air shipments purchased in the United States for shipment from Japan to anywhere in the world:

Total pounds of shipments between September 1, 2002 and November 30, 2007

Total pounds of shipments from December 1, 2007 to January 4, 2011

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com

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3. Please state the sum total dollar Purchase Amount that you paid for freight forwarding shipments to all Defendants or affiliates of the Defendants during the following time periods on the following routes:

a. From July 5, 2005 to December 31, 2006 from China to the United States:

CURRENCY	AMOUNT	DATES (MMDDYY)	ORIGIN(S)	DESTINATION(S)
USD	25,000 -	11/20/05 3/14/06	SAN FRANCISCO	PHILADELPHIA / LANSING

b. From Hong Kong to the United States during (i) August 2005 to January 1, 2006; (ii) August 2006 to January 1, 2007; (iii) August 2007 to January 1, 2008 time period; or for shipments from Hong Kong to anywhere in the world that were purchased in the United States for the same periods of time:

CURRENCY	AMOUNT	DATES (MMDDYY)	ORIGIN(S)	DESTINATION(S)

If you know that you have made shipments with Defendants within the timeframes above, but cannot state your purchases with specificity, please state the reasons why you cannot provide the information requested:

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com



485527298122

SECTION C – SUBMISSION TO JURISDICTION OF THE COURT

By signing below, you are submitting to the jurisdiction of the United States District Court for the Eastern District of New York.

SECTION D – CERTIFICATION UNDER PENALTY OF PERJURY

I hereby certify under penalty of perjury that:

1. The information provided in this Claim Form is accurate and complete to the best of my knowledge, information and belief;
2. I agree to provide additional information to Settlement Class Counsel or the Claims Administrator to support my claim, if necessary;
3. I am either (a) a member of the Settlement Class and did not request to be excluded from the Settlement Class or (b) the assignee or transferee of, or the successor to, the claim of a member of the Settlement Class and did not request to be excluded from the Settlement Class;
4. I have not entered into a settlement for any of the claims set forth in this Claim Form;
5. I am neither a Defendant, nor a parent, employee, subsidiary or affiliate of a Defendant;
6. I am not a government entity; and
7. I have not submitted any other claim for the same purchases of Freight Forwarding Shipping Services and have not authorized any other person or entity to do so, and know of no other person or entity having done so on my behalf.

Signature

Date

02 - 21 - 16
MM DD YY

Class Member (Print your name)

First Name

JOHN

MI

Last Name

JOHN TERZIAN

Business Name

BREMER LLOYD LTD

Claimant Name (if different from above)

First Name

MI

Last Name

Social Security Number

OR

Taxpayer ID

30 - 2368815

Title (e.g., President, CFO)

PRESIDENT

Phone Number

215-817-8654

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com

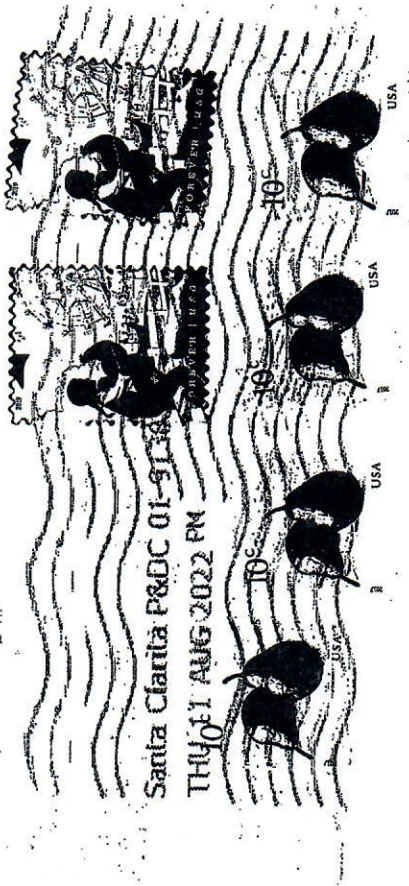
[REDACTED]

BREMER LLOYD LTD.

P. O. Box 3894

VALLEY VILLAGE, CALIFORNIA 91617

[REDACTED]



FREIGHT FORWARDERS SETTLEMENT
C/O FREIGHT FORWARDERS CLAIMS ADMINISTRATOR
P. O. Box 3747
PORTLAND, OREGON 97205-3747, USA

EXHIBIT

4

BREMER LLOYD ORGANIC

EXPORT – WHOLESALE FOR LECLAIRE & BAYOT PRODUCTS

Postfach 3894, Valley Village, California 91617 – 1-215-817-0654

LeClaireandBayot@gmail.com - BremerLloyd@gmail.com



22 August 2022

Freight Forwarders Settlement
c/o Freight Forwarders Claims Administrator
P. O. Box 3747
Portland, Oregon 97205-3747, USA

Ladies and Gentlemen,

I see a lot of correspondence on this settlement but I have not seen any money having been paid out.

It is necessary that you effect payment.

Very truly yours,

John von Terzian

Enclosures

Freight Forwarders Settlement

c/o Freight Forwarders Claims Administrator
PO Box 3747
Portland, Oregon 97208-3747



4855122054817

LECLAIRE INC
PO BOX 3894
VALLEY VLG, CA 91617-3894

July 15, 2016

Tracking No. 1704287

Dear John von Terzian,

Thank you for your recent correspondence.

To determine if you qualify for Settlement benefits, you may fill out and complete the Claim Form and mail it to the Claims Administrator. We can confirm that we have not received a claim form from you.

If you did not file a claim postmarked by the August 24, 2015 First Round Settlement deadline, or by the March 31, 2016 Second Round Settlement deadline, you may still file a claim for the Third Round Settlements.

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The claims filing deadline for the Third Round Settlement is April 3, 2017. If you have not filed a claim as part of the First or Second Round Settlements, you must file your Third Round claim online or by mail, postmarked by the April 3, 2017 deadline.

Claims may be submitted online at www.FreightForwardCase.com. If you submit a Claim Form, you will receive future notifications containing additional important information, including with respect to any future Settlements. You may also download and mail your completed form to:

Freight Forwarders Claims Administrator
P.O. Box 3747
Portland, OR 97208-3747

If you should have any further questions please don't hesitate to visit the website www.FreightForwardCase.com or call us: US/Canada: 877-276-7340 / International: 1-503-520-4400.

Sincerely,

Freight Forwarders Claims Administrator

BREMER LLOYD ORGANIC

EXPORT – WHOLESALE FOR LeCLAIRE & BAYOT PRODUCTS

Postfach 3894, Valley Village, California 91617 – 1-215-817-0654

LeClaireandBayot@gmail.com - BremerLloyd@gmail.com



9 August 2022

Freight Forwarders Settlement
c/o Freight Forwarders Claims Administrator
P. O. Box 3747
Portland, Oregon 97205-3747, USA

Ladies and Gentlemen,

To date, we have not received any Settlement or Distribution on the above matter.

We request your prompt attention and resolution of same.

Very truly yours,

John von Terzian
President

Enclosures

FREIGHT FORWARDERS SETTLEMENT
C/O FREIGHT FORWARDERS CLAIMS ADMINISTRATOR
PO BOX 3747
PORTLAND, OR 97208-3747
U.S.A



485527298122

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LECLAIRE INC
PO BOX 3894
VALLEY VLG, CA 91617-3894

AS-IS

Document Control

CLAIM FORM

GENERAL INSTRUCTIONS

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To be eligible to share in the Settlement Fund for the Settlement Class in the above-named class action, you must have (1) directly purchased Freight Forwarding Services; (2) from any of the Settling or Non-Settling Defendants, their subsidiaries, or affiliates; (3) from January 1, 2001 through January 4, 2011; (4) in the U.S., or outside the U.S. for shipments within, to, or from the U.S.

"Freight Forwarding Services" means freight forwarding, transportation, or logistics services for shipments, including services relating to the organization or transportation of items via air and ocean, which may include ancillary rail and truck services, both nationally and internationally, as well as related activities such as customs clearance, warehousing, and ground services.

If you fit this description you are a member of the Settlement Class and are entitled to submit a claim to share in the Settlement Fund. Excluded from the Settlement Class are all Defendants, their subsidiaries and affiliates, and their co-conspirators. Also excluded from the Settlement Class are all governmental entities.

Settlement Class Members who seek payment from the Settlement Fund must complete and return this Claim Form. If you already submitted a Claim Form for the first round of Settlements, you do not need to file a new claim. You will automatically be paid from this second round of Settlements. Completed Claim Forms must be mailed to the Freight Forwarders Claims Administrator ("Claims Administrator") at the above address or can be submitted via the Settlement website, www.FreightForwardCase.com. Claim Forms must be **POSTMARKED OR SUBMITTED ONLINE NO LATER THAN MARCH 31, 2016**. You should save all relevant documents supporting your claim as you may be required to provide them later.

All inquiries regarding your claim should be made (1) in writing to the Claims Administrator at the address above, (2) by visiting the settlement website, www.FreightForwardCase.com, (3) via e-mail at questions@FreightForwardCase.com, or (4) by calling the information helpline: U.S. & Canada (Toll-Free) 1-877-276-7340; International (Toll) (503) 520-4400.

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**QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com**

X1-CA4855
K3301 v.19 06.16.2015



485527298122

Claim Form, you acknowledge that you have read and understand the Notice, and you agree to the Releases included as a material term of each settlement agreement.

If you fail to submit a timely Claim Form, your claim may be rejected and you may be precluded from any recovery from the Settlement Fund. If you are a member of the Settlement Class and you do not timely and validly seek exclusion from the Settlement Class, you will be bound by any judgment entered by the Court approving the Settlements regardless of whether you submit a Claim Form.

To receive the most current information and regular updates, please submit your Claim Form on the settlement website at www.FreightForwardCase.com. On the settlement website, you will be able to submit web claims and receive future notices via email. Accordingly, if you prefer to receive all future notices by mail only, please check here. ☐

SECTION A - CLAIMANT INFORMATION

Claimant Name(s) (As you would like the name(s) to appear on the check, if eligible for payment):

First Name	MI	Last Name
J O H N		V O N T E R Z I A N
Business Name		
B R E I T E R L L C O S D L T D		

Name Of The Person You Would Like The Claims Administrator To Contact Regarding This Claim (if different from the Claimant Name(s) listed above):

First Name	MI	Last Name

Claimant Or Representative Contact Information: The Claims Administrator will use this information for all communications relevant to this Claim (including the check, if eligible for payment). If this information changes, you MUST notify the Claims Administrator in writing at the address above or online at www.FreightForwardCase.com.

MAILING ADDRESS:

Street Address		
P.O. BOX 3894, VALLEY VILLAGE, CA. 91617		
501 N CANADON AVE		
City	State	Zip Code/Postal Code
L A N S D A L E	CA	91446
Country (Other than U.S.)	Province	
Daytime Telephone Number	Evening Telephone Number	
215-817-0654		
Email Address		
J.VONTERRIZIAN@GMAIL.COM		

IF YOU FAIL TO SUBMIT A COMPLETE CLAIM BY MARCH 31, 2016, YOUR CLAIM IS SUBJECT TO REJECTION OR YOUR PAYMENT MAY BE DELAYED.

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com

X2-CA4855
K0302 V.19 06.16.2015

485527258122

SECTION B - SCHEDULE OF QUALIFYING PURCHASES OR SHIPMENTS

Please provide a summary of all Freight Forwarding Shipping Services that you have purchased from any of the below listed defendants or their subsidiaries or affiliates: (1) for shipments within, to, or from the United States or (2) in the United States for shipments anywhere in the world, during the period from January 1, 2001 to January 4, 2011. Please type or print neatly all information and check all that apply. If you need additional space, please continue on additional pages, make a note of the same on this Claim Form, and submit your additional pages with this Claim Form. Round the total purchase amount to the nearest dollar or whole unit of the currency for which you are claiming. Please indicate the currency you are using (Example: USD, EUR, CAD, JPY, CNY). Please also specify the date(s) of your purchase(s) and the origin(s) and destination(s) of your shipment(s).

Freight Forwarder (Indicate All That Apply)	Total Purchase Amount January 1, 2001 through January 4, 2011 (All Freight Charges And Surcharges, Excluding Taxes On Those Charges)			Shipping Routes	
	CURRENCY	AMOUNT	DATE(S) (MMDDYY)	ORIGIN(S)	DESTINATION(S)
ABX or SAIMA					
BAX Global					
Dachser					
DPD or DSV					
DHL, Danzas (dba, DHL Global Forwarding), or Deutsche Post					
DHL Japan, DHL Global Forwarding Japan K.K., Danzas Marten, Airborne Express, or Air Express International					
EGL or Eagle					
Exel					
Expeditors					
Geodis or Geodis Wilson					
Geo-Logistics or Agility					

X3-CA4855
K8303 v.18 06.18.2016

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com

485527298122

CARRIER	CURRENCY	AMOUNT	DATE(S) (MM/DD/YY)	ORIGIN(S)	DESTINATION(S)
Hankyu Hanshin Express, Hankyu Travel International or Hanshin Air Cargo					
Hellman	USD	2000	1/1/2007 3/1/2011	BREITEN CONSOLIDATION	PHILADELPHIA via NEW YORK
Jet Speed					
Kuehne + Nagel or Kuehne + Nagel	USD	10,000	1/1/2007 2001-2011	BREITEN, F. MAURER (AND)	NEW YORK PHILADELPHIA
Kimetsu World Express					
"K" Line Logistics					
MOL Logistics					
Morrison Express					
Nippon Express					
Nishi-Nippon					
Nissin					
Panalpina					
Schenker or Deutsche Bahn	USD	2,000	1/1/2007 3/1/2011	BREITEN/CONSOLIDATION	PHILADELPHIA via NEW YORK
SDV					
Toll or Balltrans					
UPS Supply Chain Solutions Inc., United Parcel Service (UPS), Menlo Worldwide, or Emery	USD	2,000	1/1/2007 3/1/2011	CHINA	PHILADELPHIA

X4-CA4855
K8304 v. 9/25/16, 2015QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com

485527298122

United Air cargo Consolidators	CURRENCY	AMOUNT	DATE(S) (MMDDYY)	ORIGIN(S)	DESTINATION(S)
UTI Worldwide					
Vanec					
Yarnato					
Yusen Air & Sea					

1. Please state the sum total of freight forwarding shipments that you made with all Defendants or affiliates of the Defendants for each of the following:

a. For air shipments from Japan into the United States:

Total number of shipments between September 1, 2002 and November 30, 2007

Total number of shipments between December 1, 2007 and January 4, 2011

b. For air shipments from anywhere in the world (except Japan) to the United States:

Total number of shipments from January 1, 2003 to November 30, 2007

Total number of shipments from December 1, 2007 to January 4, 2011

c. For ocean shipments from anywhere in the world to the United States:

Total number of shipments between September 1, 2002 and November 30, 2007

Total number of shipments between December 1, 2007 and January 4, 2011

2. Please state the sum total poundage of freight forwarding shipments that you made with all Defendants or affiliates of the Defendants for each of the following:

a. For air shipments from anywhere in the world into the United States:

Total pounds of shipments between October 1, 2001 and November 30, 2007

Total pounds of shipments between December 1, 2007 and January 4, 2011

b. For air shipments from Japan to the United States, or for air shipments purchased in the United States for shipment from Japan to anywhere in the world:

Total pounds of shipments between September 1, 2002 and November 30, 2007

Total pounds of shipments from December 1, 2007 to January 4, 2011

X5-CA44855
KSS003 v. BSA, et al., 2015

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com

485527298122

3. Please state the sum total dollar Purchase Amount that you paid for freight forwarding shipments to all Defendants or affiliates of the Defendants during the following time periods on the following routes:

a. From July 5, 2005 to December 31, 2006 from China to the United States:

CURRENCY	AMOUNT	DATES (MM/DD/YY)	ORIGIN(S)	DESTINATION(S)
USD	25,000 -	1/1/2005 3/11/2006	Shanghai	PHILADELPHIA LAUSD MC

AS-IS
Document Control

b. From Hong Kong to the United States during (i) August 2005 to January 1, 2006, (ii) August 2006 to January 1, 2007, (iii) August 2007 to January 1, 2008 time period, or for shipments from Hong Kong to anywhere in the world that were purchased in the United States for the same periods of time:

CURRENCY	AMOUNT	DATES (MM/DD/YY)	ORIGIN(S)	DESTINATION(S)

If you know that you have made shipments with Defendants within the timeframes above, but cannot state your purchases with specificity, please state the reasons why you cannot provide the information requested:

X6-CA4855
Issue 1/19 Dec 15 2015

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com



485527298122

SECTION C – SUBMISSION TO JURISDICTION OF THE COURT

By signing below, you are submitting to the jurisdiction of the United States District Court for the Eastern District of New York.

SECTION D – CERTIFICATION UNDER PENALTY OF PERJURY

I hereby certify under penalty of perjury that:

1. The information provided in this Claim Form is accurate and complete to the best of my knowledge, information and belief;
2. I agree to provide additional information to Settlement Class Counsel or the Claims Administrator to support my claim, if necessary;
3. I am either (a) a member of the Settlement Class and did not request to be excluded from the Settlement Class or (b) the assignee or transferee of, or the successor to, the claim of a member of the Settlement Class and did not request to be excluded from the Settlement Class;
4. I have not entered into a settlement for any of the claims set forth in this Claim Form;
5. I am neither a Defendant, nor a parent, employee, subsidiary or affiliate of a Defendant;
6. I am not a government entity; and
7. I have not submitted any other claim for the same purchases of Freight Forwarding Shipping Services and have not authorized any other person or entity to do so, and know of no other person or entity having done so on my behalf.

Signature

Date

02 - 21 - 16
MM DD YY

Class Member (Print your name)

First Name

J O H N

MI

Last Name

V O N T E R Z I A N

Business Name

B R E T E R L L O Y D L T D

Claimant Name (if different from above)

First Name

MI

Last Name

Social Security Number

OR

Taxpayer ID

3 0 - 2 3 6 8 8 1 5

Title (e.g., President, CFO)

P R E S I D E N T

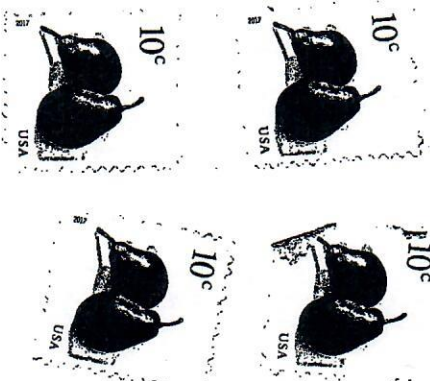
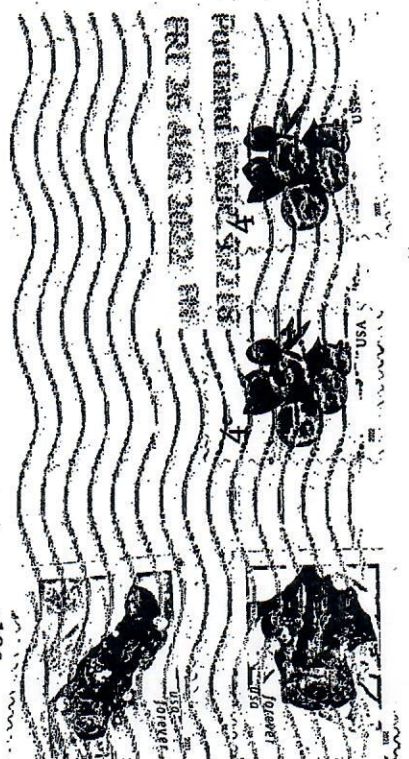
Phone Number

2 1 5 - 8 1 7 - 8 6 5 4

QUESTIONS? CALL U.S. & CANADA (TOLL-FREE): 1-877-276-7340;
INTERNATIONAL (TOLL): 503-520-4400; OR VISIT www.FreightForwardCase.com

X7-CA4855
K8307 v.19 08.16.2015

BREMER LLOYD ORGANIC
EXPORT - WHOLESALE FOR
LECLAIRE & BAYOT PRODUCTS
POSTFACH 3894
VALLEY VILLAGE, CALIFORNIA 91617



FREIGHT FORWARDERS SETTLEMENT
C/O FREIGHT FORWARDERS CLAIMS ADMINISTRATOR
P.O. BOX 3747
PORTLAND, OREGON 97205-3747, USA

EXHIBIT

5

BREMER LLOYD ORGANIC

EXPORT – WHOLESALE FOR LeCLAIRE & BAYOT PRODUCTS

Postfach 3894, Valley Village, California 91617 – 1-215-817-0654

LeClaireandBayot@gmail.com - BremerLloyd@gmail.com



22 August 2022

Freight Forwarders Settlement
c/o Freight Forwarders Claims Administrator
P. O. Box 3747
Portland, Oregon 97205-3747, USA

Ladies and Gentlemen,

I see a lot of correspondence on this settlement but I have not seen any money having been paid out.

It is necessary that you effect payment.

Very truly yours,

John von Terzian

Enclosures

FREIGHT FORWARDERS CLAIMS ADMINISTRATOR
PO BOX 3747
PORTLAND, OR 97208-3747
U.S.A.

Court-Ordered Legal Notice



Reminder Notice About Second Worldwide Freight Forwarding Services Settlements



485574512516

LECLAIRE INC
PO BOX 3894
VALLEY VLG, CA 91617-3894

256
84483



Freight Forwarding Services Settlements

File a Claim Now to Get a Payment

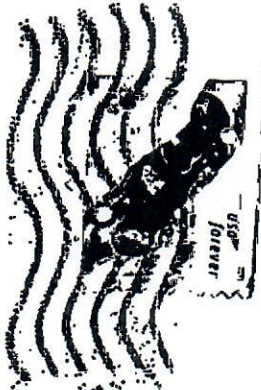
You previously should have received several notices about Settlements involving the price fixing of freight forwarding services worldwide. The Settlements provide payments to people who bought freight forwarding services in the U.S., or outside the U.S., for shipments within, to, or from the U.S. This is a reminder that you must submit a Claim Form to be paid from the Second Round Settlements by March 31, 2016.

How Much Money Can I Get? People included in the Second Round Settlements can apply now for a share in the \$197.6 million Settlement Fund. Payment amounts will be based, in part, on the amount and type of services you purchased.

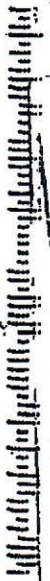
How Can I Get Money? File a Claim Form online or by mail to request a payment. The Claim Forms are available through the website and numbers below.

The deadline to submit a Claim Form for the Second Round Settlements is March 31, 2016.

**Need Help Filing a Claim? Visit: www.FreightForwardCase.com,
call: U.S. & Canada (Toll-Free) 1-877-276-7340 or International (Toll) 1-503-520-4400,
or email: questions@FreightForwardCase.com**



LOS ANGELES, CA 90013
1 SEP 2003 1PM 3 L



BREMER LLOYD ORGANIC
EXPORT - WHOLESALER FOR
LECLAIRE & BAYOT PRODUCTS
POSTFACH 3894
VALLEY VILLAGE, CALIFORNIA 91617

FREIGHT FORWARDERS SETTLEMENT
C/O FREIGHT FORWARDERS CLAIMS ADMINISTRATOR
P.O. BOX 3747
PORTLAND, OREGON 97205-3747, USA

97205

EXHIBIT

6

LECLAIRE, INC.

EXPORT – WHOLESALE

Postfach 3894 – Valley Village, California 91617

215-817-0654

LeClaireandBayot@gmail.com – BremerLloyd@gmail.com

29.08.2022
STILL NO SETTLEMENT ON THIS.



5 July 2016

Freight Forwarders Claims Administration
P. O. Box 3747
Portland, OR 97208-3747

Ladies and Gentlemen,

Our company has received the attached notice and similar previous notices.

We have not received any other information regarding the status of this claim and the progress of this action.

As you have been previously informed, we have been customers of DHL as well as Hellmann and request that you please confirm to us that all of the documentation is correct and complete in order for us to be considered part of this Class and to receive the distribution as ordered by the Court.

Thank you in advance for your attention to the above.

Very truly yours,

John von Terzian

Enclosure

FREIGHT FORWARDERS CLAIMS ADMINISTRATOR
PO BOX 3747
PORTLAND, OR 97208-3747
U.S.A.
Court-Ordered Legal Notice

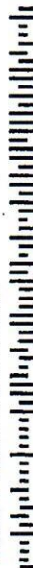
Presorted
First-Class Mail
US Postage
PAID
Milwaukee WI
Permit #4953

Reminder Notice About Worldwide Freight Forwarding Services Settlement
378658A



485557920678

*****AUTO**3-DIGIT 913 T1923 P3
LECLAIRE INC
PO BOX 3894
VALLEY VLG CA 91617-3894



Freight Forwarding Services Settlements

File a Claim Now to Get a Payment

You previously should have received several notices about Settlements involving the price fixing of freight forwarding services worldwide. The Settlements provide payments to people who bought freight forwarding services in the U.S., or outside the U.S., for shipments within, to, or from the U.S. This is a reminder that you must submit a Claim Form to be paid from the First Round Settlements by August 24, 2015.

How Much Money Can I Get? People included in the First Round Settlements can apply now for a share in the \$105.6 million Settlement Fund. Payment amounts will be based, in part, on the amount of services you purchased. The Second Round Settlements will have a separate claim process and claim deadline.

How Can I Get Money? File a Claim Form online or by mail to request a payment. The Claim Forms are available through the website and toll numbers below.

The deadline to submit a Claim Form for the First Round Settlements is August 24, 2015.

**Need Help Filing a Claim? Visit: www.FreightForwardCase.com,
call: U.S. & Canada (Toll-Free) 1-877-276-7340 or International (Toll) 1-503-520-4400,
or email: questions@FreightForwardCase.com**

N9752 v.04 08.05.2015

**FREIGHT FORWARDERS
CLAIMS ADMINISTRATOR -
PO BOX 3747
PORTLAND, OR 97208-3747
U.S.A.**

Court-Ordered Legal Notice

**Third and Final Set of Settlements in
Freight Forwarding Litigation**

Settlements with DHL and Hellmann

This notice is only a summary.

For detailed information:

Call U.S. & CANADA:

1-877-276-7340 (Toll-Free)

INTERNATIONAL:

1-503-520-4400 (Toll)

Visit www.FreightForwardCase.com

PRESORTED
FIRST-CLASS MAIL
AUTO
U.S. POSTAGE
PAID
PORTLAND, OR
PERMIT NO. 2882



4855120515752

**LECLAIRE INC
PO BOX 3894
VALLEY VLG, CA 91617-3894**

213
87140



**If You Purchased Freight Forwarding Services Providing Domestic and International Shipping,
You Could Get Benefits from a \$53.55 Million Settlement**

If you or your company used the services of certain freight forwarders, you may be entitled to a potentially significant cash payment from class action Settlements. Settlements have now been reached with the final two Defendants. Settlements were previously reached with 29 Defendants.

The Settlements involve a lawsuit claiming that certain freight forwarding companies secretly agreed to prices for their freight forwarding services worldwide, including on routes in the U.S. and between the U.S. and China, Hong Kong, Japan, Taiwan, India, Germany, the U.K. and other parts of Europe. The Settling Defendants deny that they did anything wrong.

Freight Forwarders provide transportation, or logistics services for shipments relating to the organization or transportation of items via air and ocean, which may include ancillary rail and truck services, both nationally and internationally, as well as related activities such as customs clearance, warehousing, and ground services.

Who is Included

You may be included in one or more of the Settlements (as a Class Member) if you: (1) Directly purchased Freight Forwarding Services; (2) from any of the Defendants, their subsidiaries, or affiliates; (3) from January 1, 2001 through January 4, 2011; (4) in the U.S., or outside the U.S. for shipments within, to, or from the U.S.

What Do the Settlements Provide?

DHL and Hellmann will establish a \$53,550,000

Settlement Fund. The amount of your benefits will be determined by the Plan of Allocation, which is posted on www.FreightForwardCase.com.

How to Get Benefits?

You need to submit a Claim Form, online or by mail, by April 3, 2017 to get a payment from the Settlements. You can obtain a Claim Form by calling one of the numbers on the front of the postcard or visiting the website. **If you already submitted a Claim Form for the first or second round of Settlements, you do not need to file a new claim.** You will automatically be paid from this third round of Settlements.

Your Other Rights

Even if you do nothing you will be bound by the Court's decisions. If you want to keep your right to sue DHL or Hellmann yourself, you must exclude yourself by **September 20, 2016** from that Settlement. If you stay in a particular Settlement, you may object to it by **September 20, 2016**.

The Court has appointed lawyers to represent you at no charge to you. You may hire your own lawyer at your own cost. The Court will hold a hearing on **November 4, 2016** to consider whether to approve: (1) the Settlements, (2) a request for attorneys' fees up to 33% of the Settlement Fund, plus interest, and reimbursement for litigation expenses; and (3) a request for Class Representative service awards of no more than \$75,000 each. You or your own lawyer may appear and speak at the hearing.

P3442 v.02 06.07.2016

FREIGHT FORWARDERS CLAIMS ADMINISTRATOR
PO BOX 3747
PORTLAND, OR 97208-3747
U.S.A.

Court-Ordered Legal Notice



Reminder Notice About Worldwide Freight Forwarding Services Settlement



485557920678

*****AUTO**3-DIGIT 913 T1923 P3
LECLAIRE INC
PO BOX 3894
VALLEY VLG CA 91617-3894
[Intelligent Mail Barcode]

Freight Forwarding Services Settlements

File a Claim Now to Get a Payment

You previously should have received several notices about Settlements involving the price fixing of freight forwarding services worldwide. The Settlements provide payments to people who bought freight forwarding services in the U.S., or outside the U.S., for shipments within, to, or from the U.S. This is a reminder that you must submit a Claim Form to be paid from the First Round Settlements by August 24, 2015.

How Much Money Can I Get? People included in the First Round Settlements can apply now for a share in the \$105.6 million Settlement Fund. Payment amounts will be based, in part, on the amount of services you purchased. The Second Round Settlements will have a separate claim process and claim deadline.

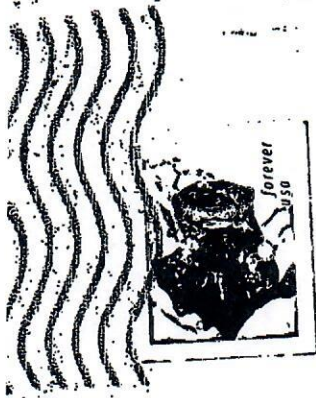
How Can I Get Money? File a Claim Form online or by mail to request a payment. The Claim Forms are available through the website and toll numbers below.

The deadline to submit a Claim Form for the First Round Settlements is August 24, 2015.

**Need Help Filing a Claim? Visit: www.FreightForwardCase.com,
call: U.S. & Canada (Toll-Free) 1-877-276-7340 or International (Toll) 1-503-520-4400,
or email: questions@FreightForwardCase.com**

NB752 v.04 08.05.2015

SANTA CLARITA CA 913
29 AUG 2022 PM 3 L



JOHN VON TERZIAN
POSTFACH 3894
VALLEY VILLAGE, CALIFORNIA 91617

FREIGHT FORWARDERS CLAIMS ADMINISTRATION
P. O. BOX 3747
PORTLAND, OR 97208-3747



EXHIBIT

7

BREMER LLOYD ORGANIC

EXPORT – WHOLESALE FOR LECLAIRE & BAYOT PRODUCTS

Postfach 3894, Valley Village, California 91617 – 1-215-817-0654

LeClaireandBayot@gmail.com - BremerLloyd@gmail.com



23 September 2022

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ OCT 03 2022 ★
BROOKLYN OFFICE

United States District Court
Eastern District of New York
225 Cadman Plaza E,
Brooklyn, NY 11201

John Gleeson, United States District Judge

In Re:

PRECISION ASSOCIATES, INC., *et al.*, on
behalf of themselves and all others similarly
situated.

Plaintiffs.

- versus -

PANALPINA WORLD TRANSPORT
(HOLDING) LTD., *et al.*,

Defendants.

MEMORANDUM
AND ORDER
08-cv-42 (JG) (VVP)

:
May it please the Court, Your Honor,

After years and years of correspondence and document submissions, the attached letter is what we got from the Defendants. They have not paid a single penny out.

Cont'd...1/2

United States District Court
Brooklyn, NY 11201

John Gleeson, United States District Judge

In Re:

PRECISION ASSOCIATES, INC., *et al.*, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

- versus -

PANALPINA WORLD TRANSPORT
(HOLDING) LTD., *et al.*,

Defendants.

MEMORANDUM
AND ORDER
08-cv-42 (JG) (VVP)

PAGE TWO

I respectfully petition the Court to order the Defendants to pay the share due to us.

Thank you.

Respectfully submitted,

John von Terzian

Enclosure: Letter from Freight Forwarders Claims Administrator

**Freight Forwarders Settlement
c/o Freight Forwarders Claims Administrator
P.O. Box 3747
Portland, Oregon 97208-3747
United States**



4855123610849

**LECLAIRE INC
JOHN VON TERZIAN
PO BOX 3894
VALLEY VILLAGE, CA 91617**

**Mailing Date: September 8, 2022
Tracking Number: 1704287**

Dear John von Terzian,

Thank you for your correspondence.

In regard to your inquiries sent on August 11, August 26, and August 29, our records do not indicate receipt of the claim form that you have referenced.

This settlement is currently closed and no more payments will be made to any claimants or class members.

Regards,

Freight Forwarders Settlement Administrator

Freight Forwarders Settlement
c/o Freight Forwarders Claims Administrator
P.O. Box 3747
Portland, Oregon 97208-3747
United States



4855123610849

LECLAIRE INC
JOHN VON TERZIAN
PO BOX 3894
VALLEY VILLAGE, CA 91617

Mailing Date: September 8, 2022
Tracking Number: 1704287

Dear John von Terzian,

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Freight Forwarders Settlement Administrator